

CALIFORNIA LEGISLATURE

STATE CAPITOL
SACRAMENTO, CALIFORNIA
95814

October 20, 2016

Matthew Rodriquez, Secretary
California Environmental Protection Agency
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

RE: CalEnviroScreen 3.0

On behalf of the Bay Area Caucus, we thank you for the development and efforts to improve the CalEnviroScreen tool, a tool aimed at identifying disadvantaged communities throughout the state, and now used to direct Greenhouse Gas Reduction Fund (GGRF) investments to those communities.

Existing law (HSC § 39711) requires the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities based on areas of the state that are either disproportionately affected by pollution or areas whose populations are socioeconomically disadvantaged. As a result, CalEPA has produced three versions of the tool since 2012 to identify a disadvantaged community (DAC): CalEnviroScreen 1.0, 2.0 and 3.0. The caucus understands this tool is intended to evolve and be modified over time as better or more accurate data becomes available. However, the tool is moving in the wrong direction as proposed in CalEnviroScreen 3.0 (CES3.0). Under this proposal, even more Bay Area communities that are severely disadvantaged are not identified as such. Under this new proposal, the Bay Area would have even fewer census tracts identified as a DAC than it did with the previous CES2.0.

The Bay Area Caucus appreciates the efforts that CalEPA has made to improve the tool over the past few years. Earlier this year, CalEPA's staff provided the caucus a brief overview of the CES tool. Members of the caucus had the opportunity to engage in a productive dialogue. The caucus requested additional factors be considered in the upcoming CES3.0, including high rent burden, high poverty rates, and high cost of living. While the proposed update of CES3.0 adds a rent burden indicator, the data utilized on household income and gross rent came from estimates dating back to 2010-2014 and does not take into consideration the extraordinary rent increases that have occurred in the Bay Area in just the last two years alone.

Under CES2.0, the Bay Area only had 4.2% of the state's DACs (85 census tracts). As proposed in CES3.0, the number of DACs in the Bay Area would be reduced to a mere 2.8% of the state's DACs (56 tracts). Certainly there are far too many areas across the entire state that are severely impacted by pollution and poverty. However, a full 24% of the entire state's cap-and-trade covered stationary

source emissions come from refineries, power plants, and other sources in the Bay Area, and in the densely-populated Bay Area, all of these sources have communities adjacent to them. Yet less than 3% of this region is considered to be a DAC, according to CES3.0. On the other hand, of the 1,990 census tracts identified statewide as DACs with CES3.0, fully 69% (1,375 tracts) are in the South Coast.

Unfortunately, the proposed CES3.0 continues to overlook too many Bay Area communities that should be clearly recognized as disadvantaged, based on some of the state's highest poverty rates, greatest health burden, and poor environmental exposures. While CES3.0 now includes Bayview-Hunters Point of San Francisco, CES3.0 fails to identify the following areas within the nine Bay Area Counties:

- Portions of West Oakland adjacent to the Port of Oakland,
- Portions of East Oakland adjacent to the I-880 freeway.
- Portions of Richmond,
- Portions of and areas adjacent to Pittsburg and Antioch, and
- Portions of San Jose.

We respectfully request that you give sincere consideration to the recommendations made by the Bay Area Air Quality Management District regarding CES3.0. One recommendation that should be specifically highlighted is to remove the half-weighting of the Environmental Effects indicators. Unless a comprehensive effort is completed to weight all indicators differentially based on the magnitude of their effects, this half-weighting should be removed. Additionally, the pesticide exposure variable (which includes only agricultural pesticide exposures) should either include urban pesticide exposures, or be deleted. In the longer term, we suggest that CalEnviroScreen move to incorporate variables to directly measure vulnerability to climate change impacts, and work collaboratively with local communities, elected officials, and agencies to ensure that vulnerable communities are not overlooked.

Regardless of the outcomes that may or may not result with the recommendations and comments to CES3.0 provided by the Bay Area Caucus and many others, future versions of CalEnviroScreen must more accurately identify disadvantaged communities to ensure that GGRF investments reach the communities most in need of economic and environmental relief, as well as improved health.

The Bay Area Caucus looks forward to working with you and your staff in the coming year to resolve the issues and concerns we have raised with CES3.0. If you have any questions, please contact Tara Dias-Andress at tara.dias@asm.ca.gov or (916) 319-3108.

Secretary Matthew Rodriguez
October 18, 2016
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Sincerely,



PHIL TING
Assemblymember, 19th District

